

COHEN & GREEN

August 31, 2022

Hon. Lois Bloom, U.S.M.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

By Electronic Filing.

Re: Case No. 1:19-cv-02170-EK-LB, Rudler v. MLA Law Offices, LTD et al.

Dear Judge Bloom:

As the Court may recall, my firm represents the Plaintiff in the case above. I write to ask that the Court set a schedule that allows Plaintiff's contempt motion to be heard at the already scheduled conference for September 13, 2022, at 11:00 a.m. Doing so would be in the interests of efficiency, since the issues are related — and scheduling an entirely separate conference (if necessary) would be a poor use of time.

To make this work, Plaintiff waives her right to reply, and thus Defendants will have the full time permitted ordinarily by Rule 27 if the Court sets a deadline to answer the motion by September 10, 2022. The Court has broad powers under Rule 27 to “shorten[]” or “extend[]” the time to respond to a motion.

As ever, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN&GREEN P.L.L.C.

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cc:
All parties by ECF.